

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

STA GROUP LLC,

Plaintiff,

v.

MOTOROLA SOLUTIONS, INC.,

Defendant.

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MOTOROLA SOLUTIONS, INC.,

Counterclaim Defendant,

v.

STA GROUP LLC, DILLON KANE GROUP  
LLC, and INSTANT CONNECT  
SOFTWARE LLC,

Counterclaim Defendants.

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Civil Action No. 2:23-CV-00030-JRG-RSP

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL DATE**

Defendant and Counterclaim Plaintiff Motorola Solutions, Inc. (“Motorola”) respectfully requests that the February 10 trial date in the above-captioned action be continued to the Court’s next available trial setting. Motorola has conferred with counsel for Plaintiff and Counterclaim Defendant STA Group LLC and Counterclaim Defendants Dillon Kane Group LLC and Instant Connect Software LLC (collectively, “STA”), and STA has confirmed it does not oppose Motorola’s request to reset the trial date to the next available date.

This case was originally scheduled for trial on November 18, 2024. Dkt. 34. Motorola was prepared to proceed on such setting. On October 16, 2024, the trial date was reset to January 27, 2025. Motorola was prepared to proceed on such date. On January 16, 2025, the trial was reset to

February 10, 2025. Motorola promptly notified STA that this new trial date presents a direct conflict with the pre-existing trial schedule for Motorola's sole technical expert, Dr. Almeroth, as well as a direct conflict for one of Motorola's key fact witnesses, Mr. Madhusudan Pai.

First, Motorola's technical expert, Dr. Almeroth, will testify in this case on issues of non-infringement, invalidity, technical comparability of licenses for purposes of patent damages, and on technical issues relevant to Motorola's counterclaim for trade secret misappropriation and unfair competition. Dr. Almeroth is also a testifying expert in *WSOU Investments, LLC v. Cisco Systems, Inc.*, No. WA:21-cv-00128-ADA in the United States District Court for the Western District of Texas. The trial in that matter, which has been set since May 15, 2024, is set to begin on February 10, 2025. Ex. A. Thus, the *WSOU* trial conflicts with the current February 10, 2025, trial date in this case. Motorola understands from Dr. Almeroth that he will provide live testimony in the *WSOU* trial on behalf of Defendant Cisco Systems, Inc. Likewise, as noted above, Dr. Almeroth will provide important testimony in this case on Motorola's defenses to STA's patent claims and Motorola's counterclaims in Motorola's case-in-chief.

Second, one of Motorola's fact witnesses, Mr. Madhusudan Pai, will testify relating to, *inter alia*, (1) Motorola's Accused Products, (2) Motorola's defense to willful infringement and (3) Motorola's counterclaim of trade secret misappropriation. Mr. Pai has a pre-scheduled international business trip the entire week of February 10, 2025, during which he is set to present and co-lead an organization-wide group in strategic meetings regarding development planning for products for which he is the system owner. Motorola's presentation of its defenses to STA's claims and of Motorola's own counterclaims will be significantly hindered if Mr. Pai is not present to testify.

Given these conflicts, Motorola respectfully requests that the Court reset the trial in this matter for the next available trial setting.<sup>1</sup>

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<sup>1</sup> Motorola also notes that its sole damages expert, Mr. Chris Bakewell, also currently has a trial scheduled the week of March 3, 2025, in Wilmington, Delaware in *Fundamental Innovation Systems Int'l LLC v. Anker Innovations Ltd.*, No. 1:21-cv-00339. See No. 1:21-cv-00339, Dkt. 231 (D. Del. Oct. 4, 2024) (Oral Order setting five-day trial starting on March 3, 2025). In that case, Mr. Bakewell will testify on behalf of defendant rebutting plaintiff's claim for patent damages. Mr. Bakewell likewise will testify in this case in response to STA's claim for patent damages, and he will also provide testimony relating to Motorola's claim for damages for its counterclaims. Given that any number of changes to trial schedules could occur between now and March 3, 2025, Motorola identifies this as a potential conflict at this time for the Court's consideration in deciding this motion and will notify the Court promptly if any changes occur in the *Fundamental Innovation Systems* case that affect the availability of Mr. Bakewell.

Dated: January 22, 2025

Respectfully submitted,

*/s/ Robert L. Maier*

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*Attorneys for Defendant and Counterclaim  
Plaintiff Motorola Solutions, Inc.*

**CERTIFICATE OF CONFERENCE**

Counsel for MSI has complied with the meet and confer requirement in Local Rule CV-7(h) and confirm that this Motion is unopposed. Counsel for MSI, Kate Burke, and counsel for STA, ICS, and DKG, Jaime Olin, met and conferred by electronic mail on the subject of this Motion on January 21, 2025. Counsel for STA, ICS, and DKG confirmed they do not oppose.

Dated: January 22, 2025

/s/ Robert L. Maier  
Robert L. Maier

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 22<sup>nd</sup> day of January, 2025.

Dated: January 22, 2025

/s/ Robert L. Maier  
Robert L. Maier